

EXHIBIT “J”

THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

EVELYN CINTRON : CIVIL ACTION NO. 19-4078
:
:
Plaintiff, :
:
vs. :
:
:
CITY OF PHILADELPHIA, ET AL. :
:
:
Defendants. :
:

- - -
Wednesday, November 15, 2023
- - -

Oral Remote Deposition of JOE SULLIVAN taken
pursuant to notice, commencing at 11:02 a.m. on the
above date, before Lori L. E. Agren, a Certified Court
Reporter and Notary Public.

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Representing the Defendant, Police Athletic League

Also Present: Evelyn Cintron

(It is stipulated by and among counsel
for the respective parties that signing, sealing and
certification be waived; and that all objections,
except as to the form of the question, be reserved
until the time of trial.)

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E X H I B I T S

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1 Q. Okay. Now, what years were you Deputy
2 Commissioner?

3 A. From three of '17 to three of '20.

4 Q. So March 2017 to March 2020?

5 A. Yes.

6 Q. Okay. And what were your duties as Deputy
7 Commissioner?

8 A. I oversaw all of the patrol forces for the
9 City of Philly. I oversaw PAL. I oversaw community
10 relations. For a part of that time, I oversaw school
11 security, Police Explorers, Neighborhood Services Unit.
12 So that's 21 patrol districts, six patrol divisions
13 which make up the patrol bureau and then those other
14 units. I may have forgotten one or two, but that's the
15 bulk of my responsibility.

16 Q. Okay. Well, talk to me about Deputy
17 Commissioner. How many Deputy Commissioners are there?

18 A. When I was there, that's a number that
19 fluctuates, but when I was promoted, the Police
20 Commissioner had a First Deputy and then there were
21 three deputies.

22 Q. Okay. So were you the First Deputy or were
23 you one of those other three?

24 A. One of the other three.

1 A. -- in order to tell you. There are a lot of
2 prominent people on there that I would know, but I
3 didn't know everyone.

4 Q. Okay. But it's fair to say that when you
5 become Deputy Commissioner, you are familiar with PAL,
6 the board members, and the partnership between PAL and
7 the Philadelphia Police Department; is that fair to
8 say?

9 A. For taking over, I had a rudimentary
10 understanding of PAL.

11 Q. Okay. And when you took over as Deputy
12 Commissioner and you are in charge of PAL,
13 Myron Patterson moves up to the First Deputy position,
14 correct?

15 A. Yes.

16 Q. And now the PAL command structure falls --
17 the police PAL command structure falls beneath your
18 purview, correct?

19 A. Yes.

20 Q. Okay. What's that structure?

21 A. Well, Lieutenant Cintron is the commanding
22 officer, and I was the Deputy Commissioner. She had
23 three sergeants that worked directly for her.

24 Q. Was Sergeant Faust one of those three

1 make that complaint or at least, laterally to another
2 Deputy Commissioner, correct?

3 MS. ULAK: Objection to form. You can
4 answer.

5 THE WITNESS: Correct.

6 BY MR. FITZPATRICK:

7 Q. So if Lieutenant Cintron had a complaint
8 about you going to Deputy Commissioner Patterson, that
9 would have been a permissible person to go to if she
10 had such a complaint, correct?

11 A. Correct.

12 MS. ULAK: I object to the form. You can
13 answer.

14 THE WITNESS: Correct.

15 BY MR. FITZPATRICK:

16 Q. And I have your response to Plaintiff's
17 Interrogatories and so I rely on your response, but I
18 certainly want to give you a chance to address these in
19 the event that we have it.

20 Mr. Sullivan, according to your response to
21 Interrogatories, you had no knowledge of disparities in
22 funding between PAL centers and minority communities
23 and PAL centers and white communities in Philadelphia.
24 Is that still a correct answer?

1 A. Yes, it is.

2 Q. Okay. And you had no knowledge of
3 complaints related to disparities in funding, correct?

4 A. That is correct.

5 Q. Do you have any knowledge with respect to
6 complaints related to disparities and other resources?

7 A. Not to my knowledge.

8 Q. Okay. We spoke about a drumline earlier,
9 instruments for a drumline. Do you recall that?

10 A. Yes.

11 Q. Did PAL have some kind of a drumline program
12 for the youth?

13 A. Yes.

14 Q. Okay. And at some point did you witness the
15 performance of the PAL drumline at a police event?

16 A. Yes, they were excellent.

17 Q. Okay. Do you recall asking Lieutenant
18 Cintron for the contact information for the leader of
19 the drumline? The person who helped administer the
20 program and teach the drum to the youth. Do you recall
21 that?

22 A. Asking her for his contact information?

23 Q. Yes.

24 A. No, I don't recall that.

1 Commissioner from PAL between March of 2017 and March
2 of 2020.

3 And with that, Mr. Sullivan, the other
4 attorneys may have some questions for you at this time.

5 MS. ULAK: Thank you.

6 Mr. Golden, do you have any questions?

7 MR. GOLDEN: Thank you.

8 EXAMINATION BY MR. GOLDEN:

9 Q. Mr. Sullivan, just so I don't come across
10 the wrong way, do you want me to call you Mr. Sullivan
11 or what is your rank so I can properly address you?

12 A. Mr. Sullivan, Joe is fine, sir.

13 Q. Okay. Mr. Sullivan, I think I just have one
14 or two quick questions. Were you ever instructed to
15 exclude Lieutenant Cintron from any PAL meetings?

16 A. Absolutely not.

17 Q. Did you instruct anyone within the City to
18 exclude -- and so let me draw a distinction here. I am
19 going to ask two questions. City employees meaning
20 police officers then I am going to ask a question about
21 PAL. Do you recall any instances where you instructed
22 a City employee to exclude Lieutenant Cintron from a
23 PAL meeting?

24 A. I have no recollection of that, but I am

1 happy to look at any documentation you have that would
2 refresh my memory.

3 Q. Did you ever tell Lieutenant Cintron that
4 anyone at PAL wanted her removed from the board or
5 pardon me. Let me rephrase that.

6 Did you ever tell Lieutenant Cintron that
7 anyone at PAL wanted her removed as the commanding
8 officer?

9 A. I did not. No one ever made that request of
10 me from the PAL group.

11 MR. GOLDEN: Thank you very much,
12 Mr. Sullivan. That's all I have.

13 MS. ULAK: Mr. Sullivan, I just have a
14 couple questions for you.

15 EXAMINATION BY MS. ULAK:

16 Q. A little while ago in the deposition there
17 was some discussion about you moving Officer Klayman to
18 Neighborhood Services. Do you recall why you moved
19 Officer Klayman to Neighborhood Services?

20 A. There was the confrontation that occurred --
21 I will say a heated verbal argument in which there was
22 an accusation that Officer Klayman who was on at the
23 time may have offered the PAL employee who he was
24 arguing with to step outside and the insinuation being